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July 25, 2011

Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 11201

Re: United States v. Jose Anthony Delos Santos; 11-mj-00272

Your Honor:

Our firm is counsel of record for Jose Delos Santos, and respectfully submit this request seeking permission for Mr. Delos Santos to have his current curfew extended to 8:30 P.M. Monday - Friday to permit him to pick-up both of his children from their child care providers and return home. Mr. Delos Santos is the father of two young children Brandon Delos Santos, age 4 and Angel Delos Santos, age 1 who reside with him and the children's mother, Nancy Pena

Both Ms. Pena and Mr. Delos Santos are employed with Ms. Pena doing "field visits" for the Department of Health and Human Services that prevents her from picking up their children on time after work. Due to the cost of health care the children have separate providers, Brandon Delos Santos' child care provider is at 1665 Randall Avenue, Bronx New York, 10474 and Angel Delos Santos' care provider in the Maria Group Family Day Care, 1529 Leland Ave Bronx, NY 10460.

Our office has been in contact with AUSA Alvin Bragg and Mr. Delos Santos' Pre-trial Services Officer in regards to this matter. They have no objections to this request or its approval.

Based upon the information submitted, we therefore ask that this Court permit Mr. Delos Santos to travel to the above listed locations with the time periods listed.

If there are any questions of additional information needed, please do not hesitate to contact me.

Respectfully submitted,

/s/ Edward J. McQuat

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